

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE APPLICATION OF **ESCAL UGS S.L.**
FOR AN ORDER PURSUANT TO 28 U.S.C. §
1782 TO OBTAIN DISCOVERY FOR USE IN
A FOREIGN PROCEEDING

Case No. _____

**PETITION AND
APPLICATION FOR AN
ORDER PURSUANT TO 28
U.S.C. § 1782 TO OBTAIN
DISCOVERY FOR USE IN A
FOREIGN PROCEEDING**

**ESCAL UGS S.L.’S MOTION FOR ADMISSION OF
ATTORNEYS ESCOBAR, MERKL, AND YOON *PRO HAC VICE***

Escal UGS S.L. (“Escal”), by and through its undersigned counsel, hereby moves for leave pursuant to L.R. 85.5.3 to admit *pro hac vice* attorneys William Escobar, Neil Merkl, and Sojin Yoon of Kelly Drye & Warren, LLP, 101 Park Avenue New York, New York 10178.

In support of its Motion, Escal states as follows:

1. The law firm of Campbell Conroy & O’Neil, P.C., One Constitution Wharf, Suite 310, Boston, MA 02129, has been retained by Escal to act as its local counsel in the above-captioned case.
2. Mr. Escobar is a member in good standing of the bar of the State of New York. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. *See* Certification of William A. Escobar (attached as Exhibit A). Mr. Escobar is also admitted to practice law in the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeal for the Second, Ninth, Tenth, and D.C. Circuits, and the Supreme Court of the United States. *See id.*
3. Mr. Merkl is a member in good standing of the bars of the State of New York and the District of Columbia. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. *See* Certification of Neil Merkl (attached as Exhibit B). Mr. Merkl is also admitted to practice law in the United States District Courts for the

Southern, Eastern and Northern Districts of New York, the United States District Courts for the Western and Eastern Districts of Wisconsin, the United States Court of Appeals for the Second, Third, Seventh and Federal Circuits, and the Supreme Court of the United States. *See id.*

4. Ms. Yoon is a member in good standing of the bar of the State of New York. There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction. *See* Certification of Sojin Yoon (attached as Exhibit C). Ms. Yoon is also admitted to practice law in the United States District Courts for the Southern and Eastern Districts of New York. *See id.*
5. Mr. Escobar, Mr. Merkl, and Ms. Yoon are counsel to Escal in other matters.
6. Because of Attorney Escobar's, Attorney Merkl's and Attorney Yoon's familiarity with issues concerning Escal, it is Escal's desire that they participate in its representation in the instant matter.
7. Mr. Escobar, Merkl, and Yoon have not previously had a *pro hac vice* admission to this Court revoked for misconduct.
8. Mr. Escobar, Merkl, and Yoon have reviewed and are familiar with the applicable provisions of the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Escal respectfully requests that William Escobar, Esq., Neil Merkl, Esq., and Sojin Yoon, Esq. be admitted to practice before this Court *pro hac vice* for the purpose of appearing as counsel for Escal in the above referenced proceeding in accordance with the Rules of this Court.

Respectfully Submitted,

By: /s/: Ashley L. McCormack

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